



# California Fair Political Practices Commission

June 16, 1986

Robert Siegfried  
Assistant General Counsel  
Pacific Bell  
One Montgomery Street  
West Tower, Fifth Floor  
San Francisco, CA 94104

Re: Your Request for Advice  
Our File No. A-86-163

Dear Mr. Siegfried:

Thank you for your concern regarding the current status of the new regulations governing lobbyist employer reporting under the Political Reform Act.<sup>1/</sup>

This letter will confirm our telephone and seminar advice to you that you should report in accordance with the new regulations. These regulations were filed as emergency regulations on May 28, 1986, and immediately became effective. However, as emergency regulations, they will cease to be effective in 120 days without further action by the Fair Political Practices Commission and the Office of Administrative Law (OAL).

Although OAL initially disapproved the new regulations, we are continuing discussions with OAL in order to resolve any problems with our rulemaking file. We hope that the regulations will be filed as permanent regulations in the near future. As the new regulations currently have the force of law, all affected parties must follow their provisions.

If you have any further questions regarding the regulations governing reporting, please contact me at (916) 322-5901.

Very truly yours,

A handwritten signature in cursive script that reads "Kathryn E. Donovan".

Kathryn E. Donovan  
Counsel  
Legal Division

KED:DL:plh

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<sup>1/</sup> Government Code Sections 81000-91015.

Richard A. Stegfried  
Assistant General Counsel

One Montgomery Street  
West Tower, Fifth Floor  
San Francisco, California 94104  
(415) 774-9151

PACIFIC  BELL  
A Pacific Telesis Company

May 8, 1986

John Larson, Chairman  
Fair Political Practices Commission  
P. O. Box 807  
Sacramento, California 95804-0807

Dear Mr. Chairman:

Pacific Telesis is concerned about its current reporting requirements under the Political Reform Act of 1974 since your proposed regulations substantially modifying the existing requirements have not yet become effective.

While we recognized that your proposed regulations would not be effective until filed with the Secretary of State, we were given to understand early in the first quarter of this year (both in telephone conversations with your technical staff and through your seminars) that we were to file our first quarter report, due April 30, 1986, using the new regulations and your new forms. Our timekeepers were notified of this and began recording reportable time under the new regulations. Since there are significant differences between the old and new regulations, we are in a quandary whether we should continue to comply with regulations which remain "in limbo."

We would like to continue recording and reporting reportable activities using the new regulations so as to minimize confusion within the Company as we have issued instructions advising our people to comply with the new (rather than the old) regulations. Therefore, we would appreciate receiving some clarification from you.

John Larson, Chairman  
May 8, 1986  
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Thank you for your attention to this matter and we look forward to hearing from you.

Sincerely,

A handwritten signature in cursive script, appearing to read "Richard A. Siegfried".

RICHARD A. SIEGFRIED  
Assistant General Counsel

RAS:nc

cc: Robert Leidigh, Esq.



# California Fair Political Practices Commission

May 14, 1986

Mr. Richard A. Siegfried  
Assistant General Counsel  
Pacific Bell  
One Montgomery Street  
West Tower, Fifth Floor  
San Francisco, CA 94104

Dear Mr. Siegfried:

Thank you very much for your letter of May 8, 1986,  
relative to the as yet to be made effective regulations.

I have referred your material to Robert Leidigh, who  
will be in touch with you.

Yours truly,

*John H. Larson*  
John H. Larson  
Chairman

JHL:sf